BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Planet Labs Inc.	)	File No. SAT-MOD-20140321-00032
	)	Call Sign: S2912
Authorization to Launch and Operate a	)	
Remote-Sensing Satellite System	)	
	)	

To: Chief, International Bureau

REQUEST OF PLANET LABS INC. FOR DETERMINATION OF COMPLIANCE WITH SATELLITE IMPLEMENTATION MILESTONES

Planet Labs Inc. ("Planet Labs"), pursuant to Section 25.164 of the Commission's Rules, hereby notifies the Commission that it has met the first four milestones set forth in the authorization released on June 18, 2014.[1] In the *Planet Labs Mod,* the Commission granted Planet Labs authority to construct, launch, and operate a non-geostationary-orbit ("NGSO") satellite system consisting of an additional thirty nine (39) Earth Exploration Satellite Service ("EESS") spacecraft that are physically and technically identical to those previously authorized under Call Sign S2912.[2] Twenty eight (28) of the additional satellites ("Flock 1b") are to operate in circular orbits between 380 and 410 kilometers. The other eleven additional satellites ("Flock 1c") are to operate in circular orbit at an altitude of 620 kilometers.

In this Request, Planet Labs demonstrates that it: (i) has entered into binding, non-contingent arrangements for the construction of all thirty nine (39) satellites authorized in the *Planet Labs Mod*; (ii) has completed Critical Design Review of all thirty nine (39) satellites; (iii) has commenced physical construction of the first satellite; (iv) and has launched at least one satellite, placed it in the authorized orbit, and operated it in accordance with the *Planet Labs Mod*

[1] *See Planet Labs Inc.,* Stamp Grant in File No. SAT-MOD-20140321-00032 (released June 18, 2014, *"Planet Labs Mod"*).

[2] *See Planet Labs Inc.,* Stamp Grant in File No. SAT-LOA-20130626-00087 (released December 03, 2013, "*Planet Labs Grant*").

authorization. As a result of these showings, Planet Labs respectfully requests that the International Bureau determine that Planet Labs has satisfied the first four milestone requirements that were imposed in the *Planet Labs Mod*.

The determination that Planet Labs has satisfied the first four satellite system implementation milestones will allow Planet Labs to reduce the amount of the $5 million bond required within the 30 days of the date of the authorization to $1 million. *See* 47 C.F.R. § 25.165(d). Planet Labs seeks the prompt issuance by the Commission of a public notice authorizing this bond reduction.

Summary

The Bureau granted Planet Labs' NGSO EESS system application on June 18, 2014 in the *Planet Labs Mod*. Paragraph 8 of the Attachment to Grant required Planet Labs to meet five satellite implementation milestones, as follows:

- Enter into a binding non-contingent contract to construct the licensed satellite system by June 18, 2015;
- Complete Critical Design Review by June 18, 2016;
- Begin construction of the first satellite by December 18, 2016;
- Launch and begin operation of the first satellite by December 18, 2017;
- Bring all of the authorized satellites into operation by June 18, 2020.

See Planet Labs Mod, Attachment to Grant at 1-2. In addition, Paragraph 9 of the Attachment to Grant also mandated that Planet Labs file a $5 million bond with the Commission within 30 days of the grant date, *i.e.* by July 18, 2014, pursuant to procedures established by the Commission.

Under the Commission's Rules, an NGSO licensee may reduce the amount of its bond by $1 million upon successfully meeting a milestone deadline set forth in Section 25.164 of the Rules. *See* 47 C.F.R. §25.165(d). The Commission's procedures provide that licensees will be permitted to file a new bond at a lower amount only after the International Bureau announces that

the licensee has met the milestone(s). *See* FCC Public Notice, Report No. SPB-187, DA 03-2602, 18 FCC Rcd 16283 (2003).

Planet Labs' progress toward implementing its authority for its additional thirty nine (39)-satellite NGSO EESS system has already reached the first four milestone points contained in the *Planet Labs Grant*. In fact, Planet Labs has constructed all thirty nine (39) satellites in-house, delivered all thirty nine (39) satellites to their respective launch integrators, and all eleven (11) of the Flock 1c satellites have been successfully launched, placed into the authorized orbit, and have begun operation in accordance with the underlying authorization. In addition, all twenty eight (28) of the Flock 1b satellites have been delivered to the launch pad and are awaiting launch currently scheduled for July 10, 2014.

Accordingly, Planet Labs is filing this notification pursuant to Sections 25.164(c), (d) and (e) of the Commission's Rules to report its completion of these four requirements. In addition, because satisfaction of these requirements permits it to reduce the amount of the bond filed with the Commission, it is requesting that the Commission review this submission and issue a determination that Planet Labs has met its first four implementation milestones, allowing it to reduce the amount of its performance bond to $1 million, commensurate with the progress made to date in bringing its authorized system into service. Appropriate showings regarding the completion of the four milestones are shown in the attachments.

Request for Determination of Milestone Compliance

Planet Labs has submitted the foregoing information in compliance with Sections 25.164(c), & (e) of the Commission's Rules governing milestone compliance. This information demonstrates that the first four implementation milestones set forth in the Planet Labs Mod have already been met. The Commission's Rules provide that NGSO licensees "will be permitted to reduce the amount of the bond by $1 million upon successfully meeting a milestone deadline set forth in section

25.164(b) of this chapter." 47 C.F.R. § 25.165(d). Inasmuch as Planet Labs has demonstrated herein that it has completed the initial four implementation milestones to which it is subject, it respectfully requests that the Commission affirm this fact, allowing it to reduce the amount of its bond to $1 million.

* * * * *

Should there be any questions regarding the foregoing information, please contact the undersigned representative.

Respectfully submitted,

PLANET LABS INC.

By: *s/ Michael Safyan*
Michael Safyan
Regulatory Compliance
Planet Labs Inc.

June 23, 2014

List of Attachments

Attachment A	Customer Payload Acceptance Receipt for the delivery of all 28 Flock 1b satellites to the launch integrator (3/19/14)
Attachment B	Press release from Spaceflight Inc. regarding the successful launch and deployment of all 11 Flock 1c satellites (6/20/14)

Attachment A

NANORACKS

Customer Payload Acceptance Receipt

Contract	Ship Via	FOB	Project
SLDC#2	SWA Cargo	Houston, TX	Flock1B

Quantity	Part No.
28	See Enclosure (1), List of all Flock1B Dove satellites by serial # with integrated NanoRacks deployer.

Received by: Kirk Woellert, External Payloads Manager, NanoRacks	Date: 3-19-14
Thank you for your trust in our products and services.	

NANORACKS

RECEIVED HOUSTON TX

Mar 19, 2014

Attachment B

Spaceflight Successfully Deploys Planet Labs' Dove Spacecraft Constellation from a Dnepr Launch Vehicle[3]

Posted by Phil Brzytwa on June 20, 2014

June 20, 2014 – Seattle – Spaceflight Inc., the company reinventing the model for launching small satellites into space, today announced it has successfully deployed 11 Planet Labs Dove earth-imaging spacecraft from an International Space Company (ISC) Kosmotras-operated Dnepr launch vehicle.

"SmallSat constellations are a critical, growing piece of the space economy," said Curt Blake, president of Spaceflight. "We are thrilled to expand our launch heritage with Planet Labs and ISC Kosmotras to enable the cost-effective and timely launch of small satellites."

Spaceflight previously deployed Planet Labs' Dove 1 and 2 satellites in April 2013 from an Orbital Sciences' Antares launch vehicle, as well as its Flock 1 constellation from the International Space Station in January 2014 with partner NanoRacks. Spaceflight then arranged for the launch of 11 more Dove spacecraft from the Dnepr vehicle through partner Innovative Solutions in Space (ISIS). The additional 11 CubeSats will complement the existing Planet Labs constellation of 3U imaging spacecraft.

Using its expertise in navigating International Traffic in Arms Regulations (ITAR) and export law and in the most recent export challenges around shipping ITAR-controlled hardware to Russia, Spaceflight arranged for Planet Labs' U.S. payload to be exported to Russia for launch integration. On June 19, 2014 at 19:11 UTC the Dnepr launch vehicle sprang out of its underground transport and launch canister, and roared through the atmosphere using its RD-264 first-stage engine. All 11 Dove spacecraft were successfully deployed roughly 30 minutes after first-stage ignition.

"We are excited to launch 11 more satellites, bringing the total number of Dove satellites launched to 43," said Mike Safyan, director of launch and regulatory at Planet Labs. "Through our unique approach to satellite design and frequency of launch, the satellites in orbit continue to get better and better."

Spaceflight has launched 47 satellites over a year and a half period, helping grow the burgeoning smallsat industry. Spaceflight's next launch is scheduled for early July 2014 onboard Orbital Sciences' Cygnus Orb-2 mission. For more information on this launch and about Spaceflight's "rideshare" launch services, visit www.spaceflightservices.com.

[3] Accessible at http://spaceflightservices.com/spaceflight-successfully-deploys-planet-labs-dove-spacecraft-constellation-from-a-dnepr-launch-vehicle/